

People Matter IW – Privacy Policy

Our privacy notice describes how and why we collect and use personal information about you in accordance with data protection legislation.

This privacy policy applies to anyone who shares information with us. The information you share with us helps us make your user experience better, to deliver more relevant content and services and to help keep you safe. We want to be clear and informative to our users and to ensure that we provide the best service possible.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you so that you are aware of how and why we are using such information.

Our Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

Data Controller

The data controller is People Matter IW, 1 + 2 Bernard Way, Riverway, Newport, Isle of Wight, PO30 5YL. This means that we are responsible for deciding how we hold and use personal information about you.

Data collection and use

Our Legal Basis for Processing Personal Data

SUMMARY

We have several legal bases for processing your personal data. In each case, we have chosen the least intrusive method for our users, anonymising data where possible in providing our service.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

1. Performance of our Service

We may need to process your personal data in order to fulfil our obligations with you. These may include, but are not limited to, the joining of People Matter IW, setting up appointments for or with you or submitting an enquiry on your behalf.

2. Consent

Where we process your personal data, whether for the purpose of sending communications from us or from our affiliated organisations, it will be based on us having obtained valid opt-in consent from you to do so. You may remove your consent at any time.

3. Legitimate Interest

Where we process your personal data to provide appointments this may include, but is not limited to, phonecall reminders.

We may process your personal data to keep audit records, keep data security or to perform statistical analysis. We may also process user data on a non-identifiable basis to develop insight on the needs of our users, which helps us, and our partners, improve our services. You have the right to withdraw your consent at any time.

The Information We Collect

SUMMARY

In order to provide our service, we collect data from our users. This may be in the form of personal data such as your email, address or telephone number. In each case, we process this data in the most sensitive manner possible.

1. Information You Provide

All of the information you provide helps ensure that we can try and tailor our services just for you and make them as relevant as possible. This includes, but is not limited to, when you:

- Give a reason for your call or visit in order to tailor your experience.
- Submit an enquiry
- Complete surveys or reviews sent to you by us.

2. Information Created

In order for us to maximise your experience with us, we collect some information when you use our services. This includes, but is not limited to:

- Your name, address, phone number and/or e mail address
- Characteristics such as ethnicity, language, nationality, date of birth, country of birth
- Outline of your support needs and your expectations

3. Electronic Communications and Calls

We may contact you by telephone regarding your appointment. Electronic communications may include but are not limited to email, SMS (text message), facebook messenger and similar internet-based messenger services.

4. Information from Other Sources

We work with numerous partners in order to benefit our members and users. We often get useful information from these sources which we may pass on to you if it is felt to be relevant.

5. If You Fail to Provide Personal Information

If you have provided information which is incorrect or inaccurate then the service that you receive may be limited.

If you fail to provide certain information when requested, we may not be able to provide the level of service you might need, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

How We Use Your Information

SUMMARY

We use the information we collect to try and tailor our services just for you and make them as relevant as possible.

We use the information collected for the following purposes:

1. Providing Services

We use the information collected to ensure that our members and users get the best possible service from our organisation and centre. This may include using the information to:

- Assist in helping to keep you safe by providing information, advice and guidance around your needs including, but not limited to,
- Keeping you up to date with relevant group meeting dates, news and events (where you have consented for us to contact you about such); and
- Make your experience with us more enjoyable by personalising your visit to The ILC.

2. Quality Assurance, Analysis and Development

In order for us to keep improving the service we provide we may use the information collected for quality assurance, analysis and development. This is to allow us to do the following:

- To improve our service to ensure that appointments are carried out in the most effective manner for you;
- To allow you to participate fully in our service when you choose to do so;
- To measure or understand the effectiveness of the service we provide to you and others, and to deliver relevant information, advice and guidance to you;
- To make suggestions and recommendations to you and others about goods or services that may interest you or them;
- To administer our service and for internal operations, including troubleshooting, data analysis, research, statistical and survey purposes;

3. **Communications from Us**

We may use the information we collect to communicate with you via your consented forms of communication. This may include us doing the following:

- Information provided from us to you;
- Updating you with information about our group meetings, events and services;
- Contacting you with regards to focus groups and 'one-off' events
- Keeping you up to date with the latest news from affiliated organisations and statutory bodies

Change of Purpose

We will only use your personal information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Information Sharing and Disclosure

SUMMARY

We treat the information we collect from our users with the utmost care. Some of our services require that we share information with other agencies or at your request. You can withdraw this consent at any time.

1. **With Your Consent or to Fulfil a Contract**

If you specifically consent to us doing so, or it is necessary for us to fulfil a contract with you, we may share your information with affiliated organisations, partners, suppliers and subcontractors and statutory agencies but only in accordance with consent from you. You may withdraw your consent at any time.

2. With the wider Public or Statutory Agencies

We love hearing from our users - including through feedback forms, our groups and forums. When you communicate with us through those channels, your communications may be minuted or recorded and utilised as anonymous feedback via our Quality Assurance systems and/or feedback forms.

3. For Legal Reasons or in the Event of a Dispute

- We may share your information if we believe it is required by applicable law, regulation, operating agreement, legal process or governmental request. This includes exchanging information with other agencies and organisations for the purposes of, for example, safeguarding or fraud protection.
- If we are ever superceded by another similar organisation we may disclose your personal data to any such new organisation.

Information Retention and Deletion

SUMMARY

We adhere to a strict retention policy after which we will no longer process your data.

- We retain your information while your case remains active, up to a period of six years after the date of your last contact with us, unless you specifically ask us to delete your information. After this period any personally identifiable information is deleted or anonymised.
- If you have been contacted by phone, then a recording of your call may be kept for up to 3 months to ensure quality assurance in our business practices.
- Any financial information that you share with us may be kept for up to 6 years in accordance with the FCA.

If you would like us to delete or anonymise your information, please e mail:

admin@peoplematteriw.org

Storage of Your Data

The data that we collect from you will always be stored at a destination inside the European Economic Area ("**EEA**"). It may also be processed by staff operating inside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps

reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. All information you provide to us is stored securely.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data should you choose to transmit it to us; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Data Security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who need to know such information. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Choice and Transparency

SUMMARY

By using our service, you do not forfeit any rights. We make it easy for our users to withdraw their consent at any time too.

1. Your Rights

You have the right to ask us not to process your personal data for marketing purposes by withdrawing consent to do so. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to

prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at: admin@peoplematteriw.org

2. Accessing and Correcting Your Information

- a) We will always give you the right to access information held about you. Your right of access can be exercised in accordance with the General Data Protection Regulations.
- b) Any access request is free of charge although you must provide us with two forms of approved identification in order for us to verify your identity.
- c) If you believe any of your information we hold is incorrect you may request we edit the name, phone number, email and postcode associated with your case or membership. Under certain circumstances, by law, you have the right to:
 - **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
 - **Request the transfer** of your personal information to another party.

Both can be actioned by contacting: admin@peoplematteriw.org

Updates to our Privacy Policy

SUMMARY

We will regularly review and may occasionally update this policy. If you use our services after an update, you consent to the updated policy.

We will always keep you in the know, so any updates we make to our privacy policy in the future will be posted on our website and, where appropriate, we will notify you by email.

Please check back frequently to see any updates or changes to our privacy policy. This policy was last updated on 24/05/2018.